

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

BLUEFIELD CHEMICALS, INC.,
Plaintiff

v.

BARIVEN S.A., and
PDVSA SERVICES, B.V.
Defendant

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Case No. 4:18-cv-02350

**PLAINTIFF BLUEFIELD CHEMICALS, INC.'S MOTION FOR ISSUANCE OF A
REQUEST FOR INTERNATIONAL JUDICIAL ASSISTANCE TO EFFECTUATE
SERVICE OF PROCESS ON DEFENDANT PDVSA SERVICES, B.V.**

Plaintiff, Bluefield Chemicals, Inc., ("Plaintiff") through undersigned counsel, hereby moves this court for an order granting this Motion and issuing a Letter of Request for International Judicial Assistance ("Letter of Request") requesting service abroad of a summons and complaint pursuant to the Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents in Civil or Commercial Matters ("Hague Service Convention").

A proposed Letter of Request for International Judicial Assistance is filed concurrently with this motion. Plaintiff makes this motion on the ground it has initiated a lawsuit against Defendant PDVSA Services, B.V., a foreign corporation organized and existing by virtue of the laws of the Netherlands. Both the United States and the Netherlands are signatories to the Hague Service Convention. For service via the Hague Service Convention, it is necessary for the Court to issue the accompanying Letter of Request to effectuate service of process on the Defendant.

For these reasons, Plaintiff respectfully prays that the Court issue the attached Letter of Request, and that the executed Letter and attached form be completed and be returned to counsel for Plaintiff for delivery to the proper authority.

Respectfully submitted,

By: 

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